

April 9, 2008

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FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
2009 APR 10 A 10:12

Ms. Thomasenia Duncan, General Counsel
Federal Election Commission
Office of the General Counsel
999 E Street, NW
Washington, DC 20463

Dear Ms. Duncan,

I appreciate the opportunity to provide this information in response to the Federal Election Commission's letter of March 26, 2009, regarding Matter Under Review (MUR) 6180.

The following comments are submitted to provide an explanation, supporting information and clarification to this matter.

In explanation, I offer the following:

As a result of a remaining debt from my 2004 campaign for United States Senate, I am required to submit quarterly Federal Election Commission reports. In July 2008, I prepared my report for the second quarter of 2008 and gave the completed report to my Executive Assistant for submittal by the July 15, 2008 deadline.

This was the first time I requested my Executive Assistant to handle submittal of the report since assuming my current position as President of the Louisiana Mid-Continent Oil and Gas Association (LMOGA). I stressed the importance of filing the report(s) timely, and out of abundance of caution and in order to insure that the report was filed by the deadline and also in order to be able to track the shipment, my assistant used Louisiana Mid-Continent Oil and Gas Association Federal Express account. This was done without my knowledge, and as a 14 year employee of LMOGA and with no prior experience with, or knowledge of, FEC Reporting requirements, she used the account strictly for the purposes mentioned above: - to insure that

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the report arrived by the deadline, and to be able to track the shipment. There was absolutely no intention for misuse of LMOGA's resources and, more importantly, no knowledge whatsoever of any potential wrongdoing. Similar situations occurred on the dates of October 7, 2008, and also on January 12, 2009.

In all instances, the reports were submitted via Federal Express solely for the purpose of being able to provide documentation of, and to be able to track the shipments, with no knowledge of any wrongdoing on anyone's part.

It should be noted that all LMOGA employees – past and present – routinely use the Association's Federal Express account for personal shipments, with amounts for those shipments reimbursed to the company. The total amount for the three (3) shipments in question in MUR 6180 are: \$24.64 (July 7, 2008); \$36.77 (October 8, 2008) and, \$33.65 (January 12, 2009) totaling \$95.06.

Again, the shipments using LMOGA's Federal Express were made without my knowledge and have been reimbursed to LMOGA.

I am available to discuss this matter and to answer any questions or provide any further documentation regarding this matter.

Thank you for the opportunity to provide these comments, and feel free to contact me should you need any further information.

Sincerely,



Chris John

cc: Joe John,

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